

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

In re:	:	Chapter 11
ORION HEALTHCORP, INC ¹ .	:	Case No. 18-71748 (AST)
	:	
Debtors.	:	(Jointly Administered)
	:	
HOWARD M. EHRENBURG IN HIS CAPACITY	:	
AS LIQUIDATING TRUSTEE OF ORION	:	Adv. Pro. No. 20-08051 (AST)
HEALTHCORP, INC., ET AL.,	:	
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
ELENA SARTISON; 2 RIVER TERRACE	:	
APARTMENT 12J, LLC; CLODAGH BOWYER	:	
GREENE A/K/A CLODAGH BOWYER;	:	
ELLIOTT GREENE,	:	
	:	
Defendants.	:	
	:	

AFFIDAVIT OF JEFFREY P. NOLAN
IN SUPPORT OF REPLY OF PLAINTIFF'S
MOTION FOR DEFAULT JUDGMENT AGAINST
2 RIVER TERRACE APARTMENT 12J, LLC

STATE OF CALIFORNIA)
)
COUNTY OF LOS ANGELES) ss.:

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Orion Healthcorp, Inc. (7246); Constellation Healthcare Technologies, Inc. (0135); NEMS Acquisition, LLC (7378); Northeast Medical Solutions, LLC (2703); NEMS West Virginia, LLC (unknown); Physicians Practice Plus Holdings, LLC (6100); Physicians Practice Plus, LLC (4122); Medical Billing Services, Inc. (2971); Rand Medical Billing, Inc. (7887); RMI Physician Services Corporation (7239); Western Skies Practice Management, Inc. (1904); Integrated Physician Solutions, Inc. (0543); NYNM Acquisition, LLC (unknown) Northstar FHA, LLC (unknown); Northstar First Health, LLC (unknown); Vachette Business Services, Ltd. (4672); Phoenix Health, LLC (0856); MDRX Medical Billing, LLC (5410); VEGA Medical Professionals, LLC (1055); Allegiance Consulting Associates, LLC (7291); Allegiance Billing & Consulting, LLC (7141); New York Network Management, LLC (7168). The corporate headquarters and the mailing address for the Debtors listed above is 1715 Route 35 North, Suite 303, Middletown, NJ 07748.


JEFFREY P. NOLAN, being duly sworn, deposes and says:

1. I am an attorney at law duly licensed to practice before all courts in the State of California and admitted pro hac vice before this Court. I am an attorney with the law firm of Pachulski Stang Ziehl & Jones LLP, attorneys of record for Plaintiff, Howard M. Ehrenberg in his capacity as Liquidating Trustee of Orion Healthcorp, Inc., et al., for the estates of the above-captioned debtors, counsel of record in this adversary proceeding. If called upon as a witness to any facts set forth herein, I could and would competently testify thereto.

2. I am counsel for Plaintiff, Howard Ehrenberg, in his capacity as the Liquidating Trustee in this adversary and my name appears on each pleading in the adversary. At no time has Defendant 2 River Terrace Apartment 12J, LLC or counsel for the Defendant contacted me, asked for an extension, or offered to file an Answer in this adversary. I have no recollection of, and can state affirmatively, that I have never talked to any lawyer from the Parlatore Law Group, LLP.

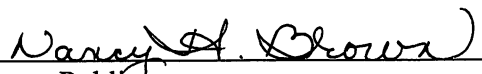
I declare under penalty of perjury pursuant to the laws of the United States of America and the State of California that the foregoing is true and correct.

Executed this 2nd day of November, 2020 at Los Angeles, California.



Jeffrey P. Nolan

SWORN TO AND SUBSCRIBED before me this
2nd day of November, 2020



Notary Public
My Commission Expires: 12/19/2022

